

1 **EXHIBIT D**

2 **UNITED STATES DISTRICT COURT**
3 **DISTRICT OF NEVADA**

4 **Drew J. Ribar,**

5 *Plaintiff,*

6 *v.*

7 **State of Nevada ex rel. Nevada Department of Corrections, Carson City, et al.,**
Defendants.

8 **Case No. 3:24-cv-00103-ART-CLB**

9

10 **EXHIBIT D – Prisoner Compartment Camera Footage**

11

12 **Filed in Support of Amended Complaint and Summary Judgment Motion (Fed. R. Civ. P.**

13 **56)**

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15 Plaintiff **Drew J. Ribar**, *pro se*, submits Exhibit D, prisoner compartment camera footage from
16 Deputy Jason Bueno's patrol vehicle on **August 30, 2022**, obtained via discovery in **Case No. 22**
17 **CR 01231 1C** (dismissed). Filed on USB per **LR IC 2-2** with a Notice of Manual Filing, this
18 exhibit supports Plaintiff's claims and Rule 56 motion.

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22 **Key Evidence and Legal Violations**

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	Cross-	Reference	
Timestamp	Incident	Legal Relevance																												
0:05:26–	Plaintiff enters vehicle; shirt, face, neck dry.	Establishes baseline for heat distress under <i>Kingsley v. Hendrickson</i> , 576 U.S. 389 (2015).	Cross-Reference																											
0:05:43–	Plaintiff requests cameras on; Deputy Palamar	Violates First Amendment recording rights per <i>Fordyce v. Seattle</i> , 55 F.3d 436 (9th Cir. 1995); <i>Glik v. Cunniffe</i> , 655 F.3d 78 (1st Cir. 2011).	Cross-Reference																											
0:05:51	refuses; Plaintiff cites <i>Fordyce, Irizarry</i> .	Denies procedural due process under <i>Mathews v. Eldridge</i> , 424 U.S. 319 (1976).	Cross-Reference																											
0:07:52–	Five unanswered sergeant requests.	Supports First Amendment public forum rights per <i>Fordyce</i> .	Cross-Reference																											
0:08:40–	“Right in front of visitor center you can’t take pictures?”	Initiates Eighth Amendment distress per <i>Hope v. Pelzer</i> , 536 U.S. 730 (2002); <i>Estelle v. Gamble</i> , 429 U.S. 97 (1976).	Cross-Reference																											
0:08:45																														
0:09:14–	Sweat spot forms on chest.	Supports First Amendment public forum rights per <i>Fordyce</i> .	Cross-Reference																											
0:09:20																														
0:10:28–	Window rolled up, door slams.	Constitutes inhumane confinement under <i>Hope</i> ; <i>Youngberg v. Romeo</i> , 457 U.S. 307 Exhibit C (1982); NRS 200.481 (battery).	Cross-Reference																											
0:10:33																														

1	2	Timestamp	Incident	Legal Relevance	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	Cross-Reference
				Demonstrates deliberate indifference																											
5	0:10:40–	“They’re trying to hot box me”; sweat spot grows.	under <i>Kingsley</i> ; <i>Wilson v. Seiter</i> , 501 U.S. 294 (1991); NRS 197.200 (oppression).																												
9	0:19:44–	No arrest notice; no seatbelt as transport begins.	Violates Fourth Amendment (<i>Devenpeck v. Alford</i> , 543 U.S. 146 (2004)); Eighth Amendment reckless disregard (<i>Hope</i>).																												
13	0:20:56–	Late Miranda; no obstruction answer.	Breaches Fifth Amendment (<i>Miranda v. Arizona</i> , 384 U.S. 436 (1966)); Fourth Amendment (<i>Thompson v. Clark</i> , 142 S. Ct. 1332 (2022)); NRS 200.460 .																												
17	0:21:35–	Neck wet, shirt soaked.	Confirms severe heat distress under <i>Hope</i> ; <i>Estelle</i> ; NRS 200.481 (battery).																												
21	0:33:23–	Exits unseatbelted after transport at highway speeds.	Demonstrates reckless endangerment under <i>Kingsley</i> ; NRS 207.190 (coercion).																												

Summary Judgment Purpose

1 These **undisputed facts**—hotboxing admission (0:10:40), visible sweating progression
2 (0:09:14–0:21:35), window closure (0:10:28), and no seatbelt risking injury at highway speeds
3 (0:19:55–0:33:23)—violate **clearly established law** (*Fordyce, Hope, Devenpeck*), defeating
4 **qualified immunity** (*Harlow v. Fitzgerald*, 457 U.S. 800 (1982)). Defendants’ potential
5 “necessity” defense fails against *Kingsley*’s **objective unreasonableness** standard.
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9 **State Law Claims**
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11 This conduct also violates **Nevada law**, including **false imprisonment** (NRS 200.460), **battery**
12 (NRS 200.481), **coercion** (NRS 207.190), and **oppression under color of law** (NRS 197.200),
13 actionable under **28 U.S.C. § 1367**.
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17 **Authentication**
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19 Per **Fed. R. Evid. 901**, I, **Drew J. Ribar**, declare under **penalty of perjury** that this footage
20 accurately depicts my confinement on **August 30, 2022**.
21

22 **Dated:** March 27, 2025
23

24 /s/ **Drew J. Ribar**
25

26 Drew J. Ribar
27

28 3480 Pershing Ln, Washoe Valley, NV 89704
PLEADING TITLE - 4

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